

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

**IN RE:
CARLOS CRESPO VASQUEZ**

CASE NO: 08-53542 C

Debtor

**TRUSTEE'S OBJECTION TO CONFIRMATION OF
DEBTOR'S CHAPTER 13 PLAN**

NOW COMES, Marion A. Olson, Jr., Chapter 13 Trustee in the above captioned case, and files this Objection to Confirmation of Debtor(s)' Chapter 13 Plan. In support thereof, the Trustee would show the Court the following:

1. On November 25, 2008, the above named Debtor(s) filed their voluntary petition for relief under Chapter 13 of the Bankruptcy Code in the United States Bankruptcy Court for the Western District of Texas, San Antonio Division.
2. The first meeting of creditors pursuant to 11 U.S.C. § 341(a) ("341 meeting") was held on January 07, 2009 and was reset to January 21, 2009 to allow Debtor(s) to prepare /amend paperwork as required by the Presiding Officer.
3. The required paperwork was not filed prior to the reset 341 meeting.

The Trustee respectfully submits that the Debtor(s) have a duty to cooperate with the Trustee, as necessary, to allow the Trustee to perform his duties pursuant to 11 U.S.C. §521(a)(3). The Trustee further submits that the Debtor(s)' failure to cooperate with the Trustee in timely filing all paperwork constitutes unreasonable delay by the Debtor(s) that is prejudicial to his creditors.

WHEREFORE, PREMISES CONSIDERED, the Trustee requests that, the Court deny confirmation of the Debtor(s)' Chapter 13 plan as it fails to meet the requirements set forth in 11 U.S.C. §1325(a)(1) & §1325(b) and for such other and further relief as this Court may deem proper.

Date: January 21, 2009

/S/

MARION A. OLSON, JR.
909 NE LOOP 410 #400
SAN ANTONIO, TX 78209
(210) 824-1460

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

IN RE:

CHAPTER 13

CARLOS CRESPO VASQUEZ

DEBTOR(S)

CASE NO.: **08-53542 C**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the attached document was served **January 21, 2009**
by First Class Mail, upon the following:

Debtor(s):

CARLOS CRESPO VASQUEZ
104 E. THOMPSON
SAN ANTONIO, TX 78225

Attorney For Debtor(s)
JAN LEDERER
750 E MULBERRY AVE #401
SAN ANTONIO, TX 78212-3154

Angelia Nava
c/o Attorney General Child Support
Attn: Bankruptcy
PO Box 12017 Credit Group
Austin, TX 78711

Arrow Financial Services
5996 W Touhy Ave
Niles, IL 60714

First Select Corporation
Attn: Bankruptcy
3200 Hobson St
Detroit, MI 48201

Ford Motor Credit Corporation
National Bankruptcy Center
PO Box 537901
Livonia, MI 48153

Gabriel Escobedo
1803 West Valley
San Antonio, TX 78227

I C System Inc
Po Box 64378
Saint Paul, MN 55164

INTERNAL REVENUE SERVICE
P O BOX 21125
PHILADELPHIA, PA 19114

Jim Halff
Halff Brothers Ranch LTD
PO Box 428
Pearsall, TX 78061

Linebarger Goggan Blair
Pena & Sampson, LLP
711 Navarro, Suite 300
San Antonio, TX 78205

Midland Credit Mgmt
8875 Aero Dr Ste 200
San Diego, CA 92123

SAN ANTONIO CREDIT UNION
6061 IH 10 W
SAN ANTONIO, TX 78201

Texas Workforce Commission
P.O. Box 877
Austin, TX 78767-0877

U.S. Attorney
Vet. Admin/Fed Housing Admin.
601 N.W. Loop 410, Ste. 600
San Antonio, TX 78216-5512

U.S. Attorney General
Department of Education
10th & Constitution, Room 5111
Washington, DC 20530

United States Trustee - SA12
US Trustee's Office
615 E Houston, Ste 533
PO Box 1539
San Antonio, TX 78295-1539

Washington Mutual Mortgage
Attention: Bankruptcy Dept. JAXA 2035
7255 Bay Meadows Way
Jacksonville, FL 32256

Wffinancial
1240 Office Plaza Dr
West Des Moines, IA 50266

INTERNAL REVENUE SERVICE
SPECIAL PROCEDURES BRANCH
300 E 8TH ST STOP 5022 AUS
AUSTIN, TX 78701

IRS
P O BOX 21126
PHILADELPHIA, PA 19114

BEXAR COUNTY DISTRICT CLERK
C/O LINEBARGER GOGGAN BLAIR...
711 NAVARRO #300
SAN ANTONIO, TX 78205

SYLVIA ROMO
TAX ASSESSOR/COLLECTOR
P O BOX 839950
SAN ANTONIO, TX 78283-3950

RJM ACQUISITIONS FUNDING LLC
575 UNDERHILL AVE #224
SYOSSET, NY 11791

/S/

Marion A. Olson, Jr.
CHAPTER 13 TRUSTEE
909 N.E. Loop 410, Suite 400
San Antonio, TX 78209
(210) 824-1460